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REDACTED – FOR PUBLIC INSPECTION

November 10, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Unbundled Access to Network Elements,
WC Docket No. 04-313, CC Docket No. 01-338

Dear Ms. Dortch:

This letter provides notice for the public record that undersigned counsel to MCI filed the attached *ex parte* letter from Alan Buzacott, with attachments containing Confidential Information, under seal and subject to the Protective Order, DA 04-2603, as subsequently modified by DA 04-3152, in the above-referenced proceeding.

The unredacted, confidential version of this filing is being hand delivered to you, as well as to Janice Myles, Competition Policy Division, Wireline Competition Bureau, as required by the Protective Order. The confidential version will be made available for inspection pursuant to the terms of the Protective Order. Arrangements may be made by contacting the undersigned at 202-777-7700.

Two copies of the filing, as redacted, are submitted herewith pursuant to the Protective Order. If you have any questions or require further information, please do not hesitate to contact me.

Sincerely,

A. Renée Callahan

cc: Janice Myles
Gary Remondino

Alan Buzacott
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November 10, 2004

Ms. Marlene H. Dortch
Office of the Secretary, FCC
445 12th St., SW
Room TW-A325
Washington, DC 20554

Re: Unbundled Access to Network Elements, WC Docket No. 04-313; Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338

Dear Ms. Dortch:

In this proceeding, BellSouth has proposed the elimination of transport unbundling in all central offices with more than 5,000 lines.[1] SBC, Verizon, and Qwest have also proposed similar business line-based tests. The Commission should reject the RBOCs' proposals because they would eliminate transport unbundling on thousands of routes on which "multiple, competitive supply" does not exist today and will not develop in the future.

I. The RBOCs' Proposals Would Eliminate Unbundling on Thousands of Routes that Do Not Have Multiple Competitive Supply

Implementing *USTA I,* the *Triennial Review Order* eliminated transport unbundling only on those routes that were suited to "multiple, competitive supply."[2] In particular, the Commission eliminated DS3 transport unbundling above a 12 DS3 "capacity threshold" and, below the capacity threshold, only on those routes on which there were either two wholesalers or three self-

[1] BellSouth Comments at 39-44. BellSouth has also proposed the elimination of unbundling for any high-capacity loop served from a central office that has more than 5,000 lines. That proposal is plainly absurd because a CLEC's ability to economically construct a loop has nothing to do with the characteristics of the *central office*; rather, as the Commission found in the *Triennial Review Order*, a CLEC's ability to economically construct a loop depends entirely on the characteristics of the customer *building*, e.g., the level of traffic that the CLEC has in the building and the distance from the CLEC's existing network to the building. *See, e.g., Triennial Review Order*, ¶¶ 303, 307.
[2] *Triennial Review Order*, ¶¶ 405, 407 (citing *United States Telecom Ass'n v. FCC*, 290 F.3d 415, 427 (D.C. Cir. 2002) ("*USTA I*").

providers of DS3 transport. Similarly, the Commission eliminated DS1 transport unbundling only on those routes on which there were at least two wholesalers of DS1 transport.

By contrast, the RBOCs' proposed tests would eliminate transport unbundling on thousands of routes on which there are fewer than three competitive transport providers – in many cases, no competitive transport providers at all – and without regard to whether there are any wholesale providers.

As an initial matter, the RBOCs have provided virtually no data to support their proposals. Only BellSouth has provided a list of central offices with more than 5,000 business lines, in the Affidavit of Shelley W. Padgett (Padgett Affidavit) attached to its comments.[3] And the BellSouth data has fundamental shortcomings that preclude the Commission from making a reliable assessment of the relationship, if any, between business line counts and the number of competitive transport providers on transport routes in BellSouth's territory. In particular, the Padgett Affidavit shows the number of fiber-based collocations in a central office, which (1) may not necessarily be an accurate measure of the number of competitive *transport providers* in a central office;[4] and (2) provides no information about the number of competitive transport providers on a particular *route.*

Even the sketchy data provided by the RBOCs in their "Fact Report" makes clear that BellSouth's proposal is wildly overbroad. Only a small percentage – less than 20 percent – of RBOC central offices with more than 5,000 business lines have three or more fiber-based collocations.[5] And even on those routes that have three or more fiber-based collocations at both ends, there is no guarantee that the *same* three transport providers have collocated in both offices or that those providers are in fact "operationally ready" to provide transport between those offices.[6] According to estimates based on the BellSouth Padgett Affidavit data, no more than 13 percent of the routes between BellSouth central offices with 5,000 or more business lines have the same three transport providers collocated at both ends of the route.[7]

Furthermore, the "Fact Report" shows that thousands of routes between RBOC central offices with more than 5,000 lines have no competitive transport providers at all. Thousands more

[3] BellSouth Comments, WC Docket No. 04-313, October 4, 2004, Attachment 4.

[4] A single transport provider may, in some offices, have multiple fiber-based collocation arrangements. Typically as a result of mergers, MCI has more than one collocation arrangement in 18 central offices in the BellSouth region. It is not clear whether BellSouth counted MCI's collocation arrangements in those offices as one fiber-based collocation or several.

[5] The "Fact Report" does not provide the number of RBOC offices with more than 5,000 business lines that have three or more collocators. MCI has derived the 20 percent figure from (1) the Fact Report's statement that about 50 percent of RBOC offices with more than 5,000 business lines have at least one collocation; and (2) Table 10 of the "Fact Report," which suggests that about 40 percent of RBOC offices with at least one collocation have two additional collocations.

[6] *Triennial Review Order*, ¶ 406. The test that MCI has proposed in this proceeding (1) looks at whether CLECs have collocated at *both* ends of a route; and (2) because even a CLEC that has collocated at both ends of a route may not be operationally ready to provide transport on that route, requires that at least four CLECs be collocated at both ends of the route. *See* MCI Comments at 141-145.

[7] Reply Declaration of Michael Pelcovits and Chris Frentrup at 23, Attachment to letter from Thomas Cohen, KDW Group, to Marlene H. Dortch, FCC, WC Docket No. 04-313, October 19, 2004.

routes have only one or two transport providers. Of the approximately 2,500 Verizon, SBC, and BellSouth central offices with 5,000 or more business lines, about 1,200 such central offices currently have no fiber based collocations at all,[8] and about 800 more central offices have only one or two fiber-based collocations. *None* of the thousands of routes between central offices with no, one, or two collocations have three or more competitive transport providers, and most of those routes have no competitive transport providers at all.

To make matters worse, the RBOCs (with the exception of SBC) propose the elimination of transport unbundling on all routes into or out of a central office with more than 5,000 business lines, even on routes between central offices with more than 5,000 business lines and central offices with fewer than 5,000 business lines. The Commission rejected a similar proposal in the *Triennial Review Order*, and should reject the RBOCs' latest proposal for the same reasons.[9] The RBOCs' own data shows that few, if any, routes between central offices with more than 5,000 business lines and central offices with fewer than 5,000 business lines have three or more competitive transport providers.[10]

II. There is No Merit to RBOC Claims that CLECs Could Build to Any Central Office with More than 5,000 Lines

Recognizing that their proposals would eliminate unbundling on thousands of routes on which "multiple, competitive supply" does not exist, the RBOCs claim that CLECs are nonetheless unimpaired on those routes because, the RBOCs argue, it is *possible* for CLECs to build to any central office with 5,000 or more business lines. The RBOCs argue, in particular, that the fact that CLECs have built to *some* central offices with 5,000 or more business lines shows that CLECs could build to *any* central office with 5,000 or more business lines. For example, the Fact Report suggests that "it is . . . reasonable to conclude that other wire centers that meet th[e] [5,000 business line] criterion could economically support competitive fiber as well."[11]

As an initial matter, past CLEC transport deployment patterns do not provide a reliable basis for predicting whether and where CLECs might build transport facilities in the future. As several commenters have stated, the assumptions that a CLEC would make when evaluating a potential transport construction project today are almost certainly very different from the assumptions that CLECs made in the past. For example, some CLECs or fiber wholesalers may have built

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[8] The "Fact Report" does not provide complete data for Qwest. Using the data provided for Verizon, SBC, and BellSouth, Table 17 of the Fact Report can be used to derive the following: Verizon has 973 offices with 5,000 or more business lines, of which 545 central offices have at least one fiber-based collocation; SBC has 1123 offices with 5,000 or more business lines, of which 449 have at least one fiber-based collocation; and BellSouth has 375 central offices with 5,000 or more business lines, of which 263 have at least one fiber-based collocation. In total, then, Verizon, SBC, and BellSouth have 2471 wire centers with 5,000 or more business lines, of which only 1257, or about 52 percent, have at least one fiber-based collocation.

[9] *Triennial Review Order*, ¶ 401 ("These proposals would effectively leverage the existence of competition in one location to remove the unbundling obligation to perhaps several other locations without any proof that a requesting carrier could self-provide or utilize alternative transport to reach those locations.").

[10] Only 0.6 percent of BellSouth offices with fewer than 5,000 business lines have 3 or more collocations. Padgett Affidavit at 5, Table 2.

[11] *Fact Report* at III-28.

transport facilities to central offices with a relatively small number of business lines (but a higher number of residential lines) based on the assumption that they could wholesale transport to Covad, Rhythms, NorthPoint, and other data CLECs targeting the residential market, or could use the transport facilities to provide their own residential DSL service. No CLEC would make that assumption today. Indeed, the bankruptcy of so many CLECs demonstrates that projections made at the time the investments were made were too optimistic. Therefore, the existence of facilities on a particular route says very little about the potential for competition even on other routes that might be considered "similarly situated."

Moreover, the RBOCs ignore the fact that, as the Commission properly found in the *Triennial Review Order*, a capacity threshold can be used to identify those routes on which the deployment of competitive transport facilities may be economic. The Commission properly determined, in particular, that 12 DS3s of traffic is the *minimum* traffic level that is sufficient to overcome barriers to entry including high fixed costs and economies of scale.[12] To the extent that CLECs have more than 12 DS3s of traffic on a route between any of the central offices on BellSouth's list, the *Triennial Review Order's* 12 DS3 backstop already provides a targeted way to limit unbundling on those routes on which it may be possible for CLECs to deploy their own transport facilities. To the extent that CLECs have fewer than12 DS3s of traffic on a route between central offices on BellSouth's list, then the effect of BellSouth's proposal would be to eliminate unbundling on precisely those routes on which CLECs do not have the ability to construct their own transport.

In any event, the RBOCs have provided no evidence to support their claim that CLECs could readily build to any central office with more than 5,000 business lines. The RBOCs point to data concerning the number of collocations in central offices with 5,000 or more business lines, but that data is most consistent with a finding that multiple competitive supply is economic only in the *exceptional* case. As is summarized above, no more than 20 percent of RBOC central offices with more than 5,000 lines have three or more collocations, and the percentage of routes that have the same three CLECs collocated at both ends of the route is even lower.

Furthermore, closer examination of the characteristics of the BellSouth central offices with more than 5,000 lines shows that they vary widely in their suitability for multiple competitive supply. In particular, as is discussed in more detail below, the BellSouth central offices that today have no collocations, or only one or two collocations, present much less favorable conditions for facilities construction than the central offices that have three or more collocations. Consequently, the Commission cannot assume that those central offices that today have no collocations, or only one or two collocations, would be able to support three collocations. And, as discussed above, even if three or more competitive transport providers were to collocate in an office, that would still fall well short of demonstrating that there is in fact "multiple, competitive supply" on a

[12] *Triennial Review Order*, ¶ 388. MCI and other commenters have emphasized that 12 DS3s is the *minimum* traffic level at which the deployment of transport facilities may be economic, and that in many instances 12 DS3s would not be sufficient for the construction of transport facilities to be economically feasible. *See* MCI Comments at 131-132; AT&T Comments at 47-48.

particular route into or out of that office.[13] MCI uses the characteristics of central offices with three collocations as the basis for comparison only because the BellSouth data does not permit route-by-route analysis, only central office-by-central office analysis, and because three collocations is a necessary – albeit far from sufficient – condition for the existence of three self-providers on a route – the *Triennial Review Order*'s definition of "multiple, competitive supply."

The Majority of Central Offices with 5,000 or More Business Lines Do Not Have Sufficient Traffic to Support Three or More Competitive Transport Providers

In the *Triennial Review Order*, the Commission found that deploying transport facilities is an expensive and time-consuming process for competitors, requiring substantial fixed and sunk costs.[14] The Commission also found that carriers can overcome those barriers to entry, including sunk costs and economies of scale, only as they develop sufficient traffic on a route.[15]

Of the 429 BellSouth central offices with 5,000 or more business lines, 263 currently have no, one, or two collocations. The Padgett Affidavit data shows that, in general, those central offices do not have sufficient traffic to support three or more competitive transport providers. As is shown in Attachment 1, which summarizes various indicators of demand provided in the Padgett Affidavit, the traffic level in those central offices with no, one, or two collocations is, on average, only about 25 to 50 percent of the traffic level in the BellSouth central offices that have three or more collocations. Because lower traffic levels make it more difficult for three or more CLECs to overcome the barriers to entry, it is unlikely that a central office that today has no, one, or even two collocations could in fact support three or more competitive transport providers.

MCI-specific data provides further evidence that it is unlikely that a central office that today has no, one, or even two collocations could in fact support three or more competitive transport providers. As is shown in Attachment 2, MCI has more than 12 DS3s in only 8 of the 122 BellSouth central offices (of 5,000 lines or more) with zero collocations; has more than 12 DS3s in only 12 of the 91 BellSouth central offices with one collocation; and has more than 12 DS3s in only 10 of the 50 BellSouth central offices with two collocations. Given that (1) the Commission has found that 12 DS3s is the *minimum* traffic level necessary to overcome the barriers to entry, and that in many instances 12 DS3s would not be sufficient to overcome the barriers to entry; (2) MCI probably has one of the highest traffic levels of any CLEC operating in the central offices on BellSouth's list; and (3) MCI has more than 12 DS3s in only 30 of the 263 BellSouth central offices with no, one, or two collocations, it is clear that few, if any, of those central offices have sufficient traffic for three or more competitive transport providers to overcome the barriers to entry.

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[13] For there to be three or more competitive transport providers on a route, the same three CLECs must collocate in the central offices at both ends of a route and those CLECs must be "operationally ready" to provide transport. As discussed above (see n.6), MCI has proposed a test that would require the same four CLECs to be collocated at both ends of a route, which is far more likely to predict whether there "multiple, competitive supply" is feasible on that route.

[14] *Triennial Review Order*, ¶ 371.

[15] *Id.* ¶¶ 377, 388.

The Majority of Central Offices with 5,000 or More Business Lines Are Located Too Far From Existing CLEC Networks for Self-Deployment to be Economic

Of the total cost of self-deploying transport facilities, a significant part – the cost of outside plant construction – varies with the length of the route. Consequently, the greater the distance from a CLEC's existing network to a central office, the higher the barriers to entry. Although the Commission's 12 DS3 backstop did not contain a distance component, commenters have shown that the greater the distance from a CLEC's network to a central office, the less likely it is that a CLEC could economically build to that central office even if it had more than 12 DS3s of traffic.[16] In addition to having relatively low traffic levels, the central offices with no, one, or two collocations generally present relatively high barriers to entry because they are in most cases not located in areas where there are multiple CLEC networks nearby.

As is shown in Attachment 2, 99 of the 263 BellSouth central offices with no, one, or two collocations are located in areas in which BellSouth has not received Phase II pricing flexibility.[17] Given that the requirements for pricing flexibility can be met even when there is only minimal CLEC network in an MSA,[18] it is doubtful that any central offices in non-Phase II areas have much, if any, existing CLEC network nearby.

Even if a central office with more than 5,000 lines is in an area that has qualified for Phase II pricing flexibility, that does not in any way guarantee that there are *multiple* CLEC networks nearby. First, several BellSouth Phase II MSAs have only one or two fiber-based CLEC networks;[19] before any central office in those MSAs could have three or more competitive transport providers, additional CLECs would have to make the decision to enter the MSA – a far higher hurdle than extending an existing CLEC network.

And even in a Phase II MSA with three or more fiber-based CLECs, central offices with more than 5,000 lines are often located far from the existing CLEC networks. MSAs typically cover a very large area, and existing CLEC networks are typically concentrated in only a small part of the MSA. In many instances, central offices with more than 5,000 lines are located well outside the small part of the MSA in which there are multiple existing CLEC networks. For example, the Atlanta MSA covers an area of over 6,000 square miles,[20] and both the Padgett Affidavit and maps provided by BellSouth show that the existing CLEC networks are concentrated in a small area in the center of the MSA.[21] Of the 23 central offices in the Atlanta MSA with more than

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[16] *See* AT&T Comments at 47-48.

[17] BellSouth wire centers that have qualified for Phase II pricing flexibility are listed in BellSouth Tariff FCC No. 1, Sections 24.2.1-24.2.2.

[18] *See Triennial Review Order*, ¶ 397.

[19] Letter from Glenn T. Reynolds, BellSouth, to Marlene H. Dortch, Secretary, FCC, October 1, 2004 (maps for Phase II MSAs Knoxville, Jackson, Pensacola, Melbourne, Greensboro, and Huntsville show only one or two fiber-based CLECs).

[20] U.S. Department of Commerce, Economics and Statistics Administration, Bureau of the Census, *State and Metropolitan Area Data Book 1997-98*, Table B-1, p. 60.

[21] Letter from Glenn T. Reynolds, BellSouth, to Marlene H. Dortch, Secretary, FCC, October 1, 2004. The Atlanta MSA map shows multiple CLEC networks only in a small area in the center of the MSA, and only isolated CLEC routes outside that small area. Consistent with that map, the offices that the Padgett Affidavit identifies as having

5,000 lines that have either no collocation or only a single collocation,[22] 21 are located well outside the core area in which there are multiple CLEC networks,[23] indicating that those central offices present very high barriers to entry. Many of the central offices in the Atlanta MSA with no collocations or only a single collocation are located more than 10 miles from the closest central office with three or more collocations.

The RBOCs' Proposed Market Definition is Contrary to USTA II

In *USTA II,* the D.C. Circuit stated that "[a]ny process of inferring impairment (or its absence) from levels of deployment depends on a sensible definition of the markets in which deployment is counted."[24] Furthermore, in its discussion of alternative market definitions, the D.C. Circuit recognized that deployment on route A-B (a route with multiple competitive transport providers) should inform the impairment analysis on route A-C (a route with only one competitive transport provider) only if B and C are "similarly situated with regard to the 'barriers to entry' identified by the Commission."[25]

The RBOCs' proposals are contrary to *USTA II* because they would require the Commission to draw inferences of nonimpairment on a large number of routes from the existence of "multiple, competitive supply" on routes that are *not* "similarly situated with respect to the barriers to entry identified by the Commission." As is discussed above, the barriers to entry vary widely among central offices with more than 5,000 lines because both traffic levels and fixed costs vary widely from central office to central office. Under *USTA II,* the existence of multiple competitive supply in *some* central offices with more than 5,000 lines -- the small minority of such central offices with relatively high traffic levels and relatively low fixed costs -- may not be used to make findings of nonimpairment with respect to the much larger number of central offices with more than 5,000 lines that have lower traffic levels and higher fixed costs.

three or more collocations are clustered in an area bounded roughly by ALPRGAMA, TUKRGAMA, ATLNGACS, and MRTTGAMA.

[22] *See* Attachment 2.

[23] The two exceptions are ATLNGAWD and ATLNGAFP.

[24] *United States Telecom Ass'n v. FCC,* 359 F.3d 554, 574 (D.C. Cir. 2004) ("*USTA II*").

[25] *Id.* at 575.

III. Conclusion

The Commission should reject BellSouth's proposal because the proposed market definition is contrary to *USTA II* and because, contrary to *USTA I*, the proposal would eliminate transport unbundling on thousands of routes on which "multiple, competitive supply" does not exist today and will not develop in the future.

Sincerely,

Alan Buzacott /ARC

Alan Buzacott

cc: Scott Bergmann
Matthew Brill
Michelle Carey
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Jessica Rosenworcel
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Attachment 1: Average Traffic Level

No. of Collocations in Central Office	Average SPA Revenue	Average EU SPA Revenue	Average EU SPA Circuits
3+			
2			
1			
0			

Source: BellSouth Comments, Attachment 4 (Affidavit of Shelley W. Padgett)

Attachment 2: MCI DS3s, Pricing Flexibility Status

Central Offices with 2 Collocations

State	CLLI Code	MCI DS3s	Phase II MSA
AL	BRHMALOX		Birmingham
AL	HNVIALMT		Huntsville
AL	HNVIALUN		Huntsville
AL	MOBLALSH		Mobile
AL	MTGMALDA		Montgomery
AL	MTGMALNO		Montgomery
FL	DYBHFLOB		Daytona Beach
FL	JCBHFLMA		Jacksonville
FL	EGLLFLBG		Melbourne
FL	FTLDFLSU		Miami
FL	MIAMFLBR		Miami
FL	MIAMFLIC		Miami
FL	MIAMFLME		Miami
FL	MIAMFLNM		Miami
FL	MIAMFLNS		Miami
FL	MIAMFLSH		Miami
FL	NDADFLAC		Miami
FL	PNSCFLWA		Pensacola
FL	DLBHFLKP		West Palm Beach
FL	JPTRFLMA		West Palm Beach
GA	ATLNGAEL		Atlanta
GA	ATLNGAWE		Atlanta
GA	LLBNGAMA		Atlanta
GA	MACNGAMT		NO
KY	LSVLKYBE		Louisville
KY	LSVLKYJT		Louisville
LA	BTRGLAOH		Baton Rouge
LA	BTRGLAWN		Baton Rouge
LA	LKCHLADT		Lake Charles
LA	NWORLAMC		New Orleans
LA	NWORLASC		New Orleans
LA	SHPTLASG		Shreveport
MS	BILXMSED		Biloxi
MS	BILXMSMA		Biloxi
MS	JCSNMSMB		Jackson
MS	JCSNMSPC		Jackson
MS	JCSNMSRW		Jackson
MS	TUPLMSMA		NO
NC	CHRLNCER		Charlotte
NC	CHRLNCTH		Charlotte
NC	WNSLNCVI		Greensboro
NC	RLGHNCJO		Raleigh
NC	RLGHNCSI		Raleigh
SC	CLMASCAR		Columbia
SC	CLMASCSW		Columbia

SC	CHTNSCWA	Charleston
TN	OKRGTNMT	Knoxville
TN	MMPHTNST	Memphis
TN	NSVLTNMC	Nashville
TN	CRVLTNMA	NO

Summary:

Offices with 2 Collocations	**50**
Offices with >12 MCI DS3s	**10**
Offices Outside Phase II Areas	**3**

Central Offices with 1 Collocation

State	CLLI Code	MCI DS3s	Phase II MSA
AL	BRHMALCH		Birmingham
AL	BRHMALHW		Birmingham
AL	BRHMALOM		Birmingham
AL	BRHMALVA		Birmingham
AL	HNVIALPW		Huntsville
AL	MOBLALSK		Mobile
AL	TSCLALMT		NO
FL	DELDFLMA		Daytona Beach
FL	GSVLFLNW		Gainesville
FL	JCVLFLLF		Jacksonville
FL	ORPKFLMA		Jacksonville
FL	COCOFLME		Melbourne
FL	TTVLFLMA		Melbourne
FL	FTLDFLSG		Miami
FL	FTLDFLWN		Miami
FL	MIAMFLAL		Miami
FL	MIAMFLOL		Miami
FL	MIAMFLWD		Miami
FL	NDADFLBR		Miami
FL	PMBHFLTA		Miami
FL	PCBHFLNT		Panama City
FL	PNCYFLMA		Panama City
FL	BCRTFLSA		West Palm Beach
FL	CCBHFLMA		West Palm Beach
FL	BKVLFLJF		NO
FL	FTPRFLMA		NO
FL	STRTFLMA		NO
GA	ASTLGAMA		Atlanta
GA	ATLNGAIC		Atlanta
GA	ATLNGAWD		Atlanta
GA	CNYRGAMA		Atlanta
GA	DGVLGAMA		Atlanta
GA	RVDLGAMA		Atlanta
GA	AGSTGAFL		Augusta
GA	AGSTGATH		Augusta
GA	SVNHGADE		Savannah
GA	SVNHGAGC		Savannah
GA	ALBYGAMA		NO

GA	SNVLGAMA	NO
GA	THVLGAMA	NO
GA	VLDSGAMA	NO
GA	WYCRGAMA	NO
KY	HPVLKYMA	Clarksville
KY	WNCHKYMA	Lexington
KY	LSVLKYAN	Louisville
KY	LSVLKYOA	Louisville
KY	LSVLKYSL	Louisville
KY	LSVLKYSM	Louisville
KY	LSVLKYTS	Louisville
KY	CRBNKYMA	NO
KY	DAVLKYMA	NO
KY	FRFTKYMA	NO
KY	PKVLKYMA	NO
KY	RCMDKYMA	NO
LA	LFYTLAVM	Lafayette
LA	LKCHLAUN	Lake Charles
LA	NWORLABM	New Orleans
LA	NWORLALK	New Orleans
LA	NWORLAMR	New Orleans
LA	NWORLARV	New Orleans
LA	NWORLASK	New Orleans
LA	SHPTLAHD	Shreveport
LA	MRCYLAIN	NO
LA	NTCHLAMA	NO
LA	NWIBLAMA	NO
MS	JCSNMSCB	Jackson
MS	HTBGMSWE	NO
MS	OXFRMSMA	NO
MS	SKVLMSMA	NO
MS	VCBGMSMA	NO
NC	DVSNNCPO	Charlotte
NC	GNBONCLA	Greensboro
NC	RLGHNCGA	Raleigh
NC	BOONNCKI	NO
NC	GLBONCMA	NO
NC	MGTNNCGR	NO
NC	SSVLNCMA	NO
SC	CHTNSCDP	Charleston
SC	CHTNSCLB	Charleston
SC	MNPLSCES	Charleston
SC	SUVLSCMA	Charleston
SC	CLMASCCH	Columbia
SC	SPBGSCWV	Greenville
SC	FLRNSCMA	NO
SC	ORBGSCMA	NO
TN	CLVLTNMA	Clarksville
TN	KNVLTNFC	Knoxville
TN	GALLTNMA	Nashville
TN	HDVLTNMA	Nashville
TN	LBNNTNMA	Nashville

TN	JCSNTNMA	NO

Summary:

Offices with 1 Collocation	**91**
Offices with >12 MCI DS3s	**12**
Offices Outside Phase II Areas	**28**

Central Offices with 0 Collocations

State	CLLI Code	MCI DS3s	Phase II MSA
AL	ALBSALMA		Birmingham
AL	BRHMALWL		Birmingham
AL	BSMRALMA		Birmingham
AL	JSPRALMT		Birmingham
AL	PHCYALMA		Columbus
AL	ATHNALMA		Huntsville
AL	HNVIALRA		Huntsville
AL	ANTNALMT		NO
AL	AUBNALMA		NO
AL	CLMNALMA		NO
AL	DCTRALMT		NO
AL	FLRNALMA		NO
AL	GDSDALMT		NO
AL	OPLKALMT		NO
AL	SELMALMT		NO
AL	SHFDALMT		NO
AL	TSCLALDH		NO
FL	NSBHFLMA		Daytona Beach
FL	FRBHFLFP		Jacksonville
FL	JCVLFLOW		Jacksonville
FL	PNVDFLMA		Jacksonville
FL	OVIDFLCA		Orlando
FL	MLTNFLRA		Pensacola
FL	WPBHFLRP		West Palm Beach
FL	KYWSFLMA		NO
FL	LKCYFLMA		NO
FL	PLCSFLMA		NO
FL	PLTKFLMA		NO
FL	PTSLFLMA		NO
FL	PTSLFLSO		NO
FL	WWSPFLSH		NO
GA	ATLNGAAD		Atlanta
GA	ATLNGABH		Atlanta
GA	ATLNGAFP		Atlanta
GA	ATLNGALA		Atlanta
GA	BUFRGABH		Atlanta
GA	CMNGGAMA		Atlanta
GA	CVTNGAMT		Atlanta
GA	FRBNGAEB		Atlanta
GA	FYVLGASG		Atlanta
GA	JNBOGAMA		Atlanta
GA	MCDNGAGS		Atlanta

GA	MRRWGAMA	Atlanta
GA	PANLGAMA	Atlanta
GA	PTCYGAMA	Atlanta
GA	SNMTGALR	Atlanta
GA	STBRGANH	Atlanta
GA	WDSTGACR	Atlanta
GA	AGSTGAAU	Augusta
GA	CLMBGAMW	Columbus
GA	SVNHGAWB	Savannah
GA	AMRCGAMA	NO
GA	BRWKGAMA	NO
GA	CLHNGAES	NO
GA	CRTNGAMA	NO
GA	CRVLGAMA	NO
GA	DBLNGAMA	NO
GA	GRFNGAMA	NO
GA	GSVLGAMA	NO
GA	LGRNGAMA	NO
GA	MACNGAGP	NO
GA	MACNGAVN	NO
GA	NWNNGAMA	NO
GA	ROMEGATL	NO
GA	TFTNGAMA	NO
GA	WRRBGAMA	NO
KY	OWBOKYMA	Owensboro
KY	BWLGKYMA	NO
KY	HNSNKYMA	NO
KY	MDVIKYMA	NO
KY	PDCHKYMA	NO
LA	BTRGLABK	Baton Rouge
LA	OPLSLATL	Lafayette
LA	CVTNLAMA	New Orleans
LA	MNVLLAMA	New Orleans
LA	NWORLAAR	New Orleans
LA	NWORLACM	New Orleans
LA	NWORLAFR	New Orleans
LA	SLIDLAMA	New Orleans
LA	ALXNLAMA	NO
LA	HMNDLAMA	NO
LA	HOUMLAMA	NO
LA	RSTNLAMA	NO
LA	THBDLAMA	NO
MS	MDSNMSES	Jackson
MS	CLMBMSMA	NO
MS	CRNTMSMA	NO
MS	GNVLMSMA	NO
MS	GNWDMSMA	NO
MS	LARLMSMA	NO
MS	MRDNMSTL	NO
MS	NTCHMSMA	NO
MS	PSCGMSMA	NO
NC	ARDNNCCE	Asheville

NC	APEXNCCE	Raleigh
NC	RLGHNCSB	Raleigh
NC	HNVLNCCH	NO
NC	LENRNCHA	NO
NC	LMTNNCMA	NO
NC	LNTNNCMA	NO
NC	NWTNNCMA	NO
NC	RTTNNCCE	NO
NC	SHLBNCMA	NO
NC	WYVLNCMA	NO
SC	AIKNSCMA	Augusta
SC	CLMASCSU	Columbia
SC	CLSNSCMA	Greenville
SC	GNVLSCCH	Greenville
SC	GRERSCMA	Greenville
SC	ARSNSCMA	NO
SC	GFNYSCMA	NO
SC	SENCSCMA	NO
SC	CLMASCDF	Columbia
TN	MAVLTNMA	Knoxville
TN	ATHNTNMA	NO
TN	CLEVTNMA	NO
TN	CLMATNMA	NO
TN	DYBGTNMA	NO
TN	JCSNTNNS	NO
TN	MRTWTNMA	NO
TN	SVVLTNMT	NO
TN	TLLHTNMA	NO

Summary:

Offices with 0 Collocations	**122**
Offices with >12 MCI DS3s	**8**
Offices Outside Phase II Areas	**68**